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Attorneys for Plaintiff Sarah Hill

IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF OREGON

PORLAND DIVISION

| | | |
|--|---|-------------------------------------|
| SARAH HILL, |) | |
| <i>individually and on behalf of those</i> |) | Case No.: 3:24-cv-01729-SI |
| <i>similarly situated,</i> |) | |
| |) | <i>Judge Michael H. Simon</i> |
| Plaintiff, |) | |
| |) | REQUEST FOR ENTRY OF DEFAULT |
| v. |) | AGAINST WILLAMETTE FALLS |
| |) | PAPER CO., INC., PURSUANT TO |
| WILLAMETTE FALLS PAPER CO., |) | RULE 55(A) |
| INC., |) | |
| |) | |
| Defendant. |) | |
| |) | |

Sarah Hill (“Plaintiff”), individually and on behalf of those similarly situated former employees as defined herein, request the Clerk to enter default against Willamette Falls Paper Co., Inc. (“Defendant”), pursuant to Fed. R. Civ. P. 55(a). Defendant has failed to answer or otherwise defend this action in a timely manner. In support of this request, Plaintiff states as follows, as evidenced by the Court’s docket, and the Declaration of Nathan R. Ring, filed contemporaneously:

1. On October 10, 2024, this civil action was filed against Willamette Falls Paper Co., Inc. (Docket Entry No. 1)

2. On October 30, 2024, a copy of the complaint and summons was served, consistent with Federal Rule of Civil Procedure 4(h) upon Defendant's Registered Agent, Brian Konen. Proof of service was filed with the Court on November 18, 2024. (Docket Entry No. 10)

3. Defendant is an artificial entity which is not in the military service, nor a minor, and cannot be considered as incompetent, as stated in the accompanying Declaration of Counsel Nathan R. Ring.

4. Willamette Falls Paper Co., Inc. has failed to answer or defend Plaintiff's complaint. WHEREFORE, Plaintiff respectfully requests the Clerk enter default of Willamette Falls Paper Co., Inc.

Respectfully submitted,

/s/ Nathan R. Ring, Esq.

Nathan R. Ring, Oregon State Bar No. 172663

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*Counsel for Plaintiff and the Proposed
Class*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing has been served via first-class U.S. Mail with adequate postage affixed thereon to the following:

Willamette Falls Paper Co., Inc.
4800 Mill Street
West Linn, Oregon 97068

Brian Konen, *Registered Agent*
4800 Mill Street
West Linn, Oregon 97068

This 3rd day of February 2025.

/s/ Michelle Wade
Michelle Wade

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IN THE UNITED STATES DISTRICT COURT
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| SARAH HILL, |) | |
| <i>individually and on behalf of those</i> |) | Case No.: 3:24-cv-01729-SI |
| <i>similarly situated,</i> |) | |
| |) | <i>Judge Michael H. Simon</i> |
| Plaintiff, |) | |
| |) | |
| v. |) | DECLARATION OF NATHAN R. RING |
| |) | |
| WILLAMETTE FALLS PAPER CO., |) | |
| INC., |) | |
| |) | |
| Defendant. |) | |
| |) | |

I, Nathan R. Ring, hereby declare as follows:

1. I am a member in good standing of the bar of Oregon, a partner at the law firm Reese, Ring, Velt PLCC, and one of the counsel of record for Plaintiff Sarah Hill in this action. The contents of this declaration are based on my personal knowledge, and if called to testify, I would competently testify hereto.

2. I provide this declaration in support of Plaintiff's Request for Entry of Default against Willamette Falls Paper Co., Inc. ("Defendant").

3. The Complaint in this action was filed on October 10, 2024. (Dkt. 1).

4. Defendant was served at my direction on October 30, 2024, with the Complaint and Summons in this action, consistent with Federal Rule of Civil Procedure 4(h), by certified mail on Defendant's corporate registered agent, Brian Konen. Proof of service was filed on November 18, 2024 (Dkt. 10).

5. Defendant has not filed an answer or otherwise responded to the Complaint (Dkt. 1) or otherwise appeared or defended this action. It is therefore in default.

6. Defendant is an artificial entity which is not in the military service nor a minor and cannot be considered as competent.

This declaration is under penalty of perjury.

DATED: February 3, 2025

/s/ Nathan R. Ring
Nathan R. Ring
Counsel for Plaintiff

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing has been served via first-class U.S. Mail with adequate postage affixed thereon to the following:

Willamette Falls Paper Co., Inc.
4800 Mill Street
West Linn, Oregon 97068

Brian Konen, *Registered Agent*
4800 Mill Street
West Linn, Oregon 97068

This 3rd day of February 2025.

/s/ Michelle Wade
Michelle Wade